

Edward W. Swanson SBN 159859  
Alexis Haller SBN 201210  
SWANSON, McNAMARA & HALLER LLP  
300 Montgomery Street, Suite 1100  
San Francisco, California 94104  
Telephone: (415) 477-3800  
Facsimile: (415) 477-9010

Attorneys for BERT VOTO-BERNALES

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BERT VOTO-BERNALES, *et al.*,

Defendants.

CASE NO. CR 06-00605

**STIPULATION AND ~~PROPOSED~~  
ORDER TO MODIFY CONDITIONS OF  
PRETRIAL RELEASE TO PERMIT  
TRAVEL**

**STIPULATION**

Defendant Bert Voto-Bernales, by and through his counsel, Edward W. Swanson, and the United States, by and through Assistant United States Attorney David Hall, hereby stipulate and agree as follows:

1. On April 26, 2006, this Court set conditions of release for defendant Bert Voto-Bernales, one of which was the condition that he not travel outside the Northern District of California.

2. Mr. Voto-Bernales seeks a modification of the conditions of his pretrial release to permit travel to Kings Point, New York, departing on June 3, 2007 and returning to the Bay Area on June 15, 2007. The purpose of the trip is to attend a program in continuing education for his Merchant Marine union.

///

///

3. Pretrial Services Officer Michelle Nero has no objection to the proposed modifications on the condition that she is provided with a copy of Mr. Voto-Bernales's itinerary and lodging information for the trip.

IT IS SO STIPULATED.

DATED: May 18, 2007

/s/  
Edward W. Swanson  
Swanson, McNamara & Haller LLP  
Counsel for Defendant Brian Voto-Bernales

DATED: May 21, 2007

/s/  
David Hall  
Assistant United States Attorney

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 22, 2007

